



BENEDETTI
FOUNDATION

Data Protection Policies and Procedures

LAST UPDATED: 13.02.21
APPROVED BY BOARD: 4 MARCH 2021

Website Privacy Notice and Policy

1.0 Context

The Benedetti Foundation is a charity (registered in Scotland SRCN SC049688) that promotes music and musical education by organising or supporting workshops for music teachers and young musicians across the United Kingdom.

It is a data controller and responsible for your personal data, and is referred to as 'BF', 'we', 'us' or 'our' in this notice and policy.

BF respects your privacy and is committed to protecting your personal data. This privacy notice aims to inform you about how we look after your personal data when you visit our website, sign up to receive any information on BF activities, sessions or updates, or register to attend or be involved in a BF event. It tells you about your privacy rights and how the law protects you, and any child for whom you are responsible. It is important that you read this privacy notice so that you are fully aware of how and why we are using your and/or your child's data.

Your use of any online services we may provide or your provision of information to us constitutes your acknowledgment of the terms of this privacy policy. Please do not send us any of your or your child's personal information if you do not want it to be used in the ways described in this privacy notice.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Contact details for data protection purposes

Data officer: Laura Gardiner, Foundation Director
The Benedetti Foundation
Turcan Connell
Princes Exchange
1 Earl Grey Street
Edinburgh
EH3 9EE

Email: laura@benedettifoundation.org

Website: <http://www.benedettifoundation.org>
ICO Registration Number: ZA674093

2.0 How this Privacy Policy and Privacy Notice applies to you

This Privacy Policy applies to your use of any BF services, such as your use of our website and any online services we provide.

When BF has a different relationship with you which involves use of your personal data, for example if you are retained as a BF teacher or BF ambassador, this will be governed by a separate contractual framework, which may incorporate some or all of this privacy notice and privacy policy by reference.

The principal purposes for which we process personal data gathered via our website are:

- to provide the service or information that you have requested
- to help us prepare and organise BF sessions and activities
- to promote BF sessions and activities and to further our charitable aims
- to develop our fundraising activities, such as processing donations and gift aid
- to gather feedback
- to comply with the law and applicable regulations

3.0 The data we collect about you and/or your child

‘Personal data’ is any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- (a) **Identity Data** (such as your name, username or similar identifier, title, and gender; your child’s name, date of birth, gender, school attended, instrument, proficiency level)
- (b) **Contact Data** (such as your address, email addresses and contact telephone numbers including emergency contacts and telephone numbers; your child’s address)
- (c) **Transaction Data** (such as details about payments made via the Stripe / PayPal platform when registering your child’s attendance at a BF session)
- (d) **Technical Data** which may include internet protocol (IP) addresses, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- (e) **Profile Data** (such as registration for BF sessions or activities, information about musical standard/attainment and any feedback and survey responses)
- (f) **Usage Data** (such as information about how you use our website or website links to BF information)
- (g) **Marketing and Communications Data** (such as your preferences for how BF communicates with you and how we keep you informed of BF sessions and activities)

BF does not collect any Special Categories of Personal Data via its website. These categories of data include details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

Where we need to collect personal data in order to provide you with a service you have requested (such as registering to attend a BF session or activity), and you fail to provide that data, we may not be able to perform the service. We will do our best to notify you if this is the case at the time.

BF collects statistical data via registration forms. This includes geographical data and previous workshops attended.

4.0 Financial and payment information

BF uses the Stripe, JustGiving and PayPal platforms to accept and process payments such as registration fees for Benedetti sessions and any donations you may consider to support our work.

Personal financial information such as credit or debit card information transmitted to or through our website is protected by the cryptographic protocols operated by PayPal and Stripe. BF and the BF website does not store or process financial information and any request or attempt to do so is unlikely to be genuine and should immediately be reported to the police and BF.

We strive to ensure that as a third party data processor PayPal or Stripe (or any similar payment processing platform as BF may use in the future) adheres to the same standards of data protection and confidentiality as BF but we make no warranty or guarantee that this is the case and accept no liability whatsoever for any acts or omissions by PayPal, Stripe (or other platforms used in the future) which cause loss or harm to any user.

5.0 How we collect your personal data

We may use different methods to collect data from and about you and/or your child. These include:

- **Direct interactions.** You may provide us with personal data for example when you:
 - visit our website
 - register your child to attend a BF session or activity
 - subscribe to YouTube or request BF information to be sent to you
 - complete a survey or give us some feedback
 - report a problem with any on-line services we provide or our website
- **Automated technologies or interactions.** When you visit our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and similar technologies. There is more information about our use of cookies in section 4 below.
- **Third parties or publicly available sources.** Examples of this might include:
 - Analytics providers or search information providers/engines
 - Advertising networks

6.0 How we use your personal data

We will only use your and/or your child's personal data when the law allows us to, for example:

- Where we need it to be able to provide you with a service, such as registering at a BF session
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Generally we do not rely on consent as a legal basis for processing your or your child's personal data via our website. The principal exceptions to this are:

- when sending direct marketing communications to you
- direct messaging via a social media platform

You have the right to withdraw consent to marketing at any time by [contacting us](#).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7.0 BF's legal basis for collecting and using your personal data

The table below shows how BF plans to use your personal data, and the legal basis on which we would do so. We have also identified what our legitimate interests would be where this applies.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register or subscribe you or your child	(a) Identity (b) Contact (c) Transaction (e) Profile (g) Marketing and communications	Performance of a contract for services with you

To prepare and deliver sessions	(a) Identity (b) Contact (c) Transaction (e) Profile (g) Marketing and communications	(a) Performance of a contract for services with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) facilitating donations to this charity (b) Asking you to leave a review or take a survey (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (e) Profile (g) Marketing and Communications	(a) Necessary for our legitimate interests (to keep our records updated and to study the quality or impact of our services) (b) Necessary to comply with a legal obligation
To administer and protect our charity and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (d) Technical	(a) Necessary for our legitimate interests (for running our charity, provision of administration and IT services, network security, to prevent fraud) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of our communications with you	(a) Identity (b) Contact (e) Profile (d) Usage (f) Technical (g) Marketing and Communications	Necessary for our legitimate interests (to study how our services are used, to develop them, to grow BF sessions and activities and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(d) Usage (f) Technical	Necessary for our legitimate interests (to grow the reach and impact of BF and its services, to keep our website updated and relevant, to develop our charity and to inform our marketing strategy)

To make suggestions and recommendations to you about future BF sessions and activities that may be of interest to you	(a) Identity (b) Contact (d) Usage (e) Profile (f) Technical	Necessary for our legitimate interests (to develop the reach of the charity and the number of musicians who may benefit)
---	--	--

8.0 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data as described above to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us, registered for a BF session or activity, or if you provided us with your details for this purpose and, in each case, you have not opted out of receiving that marketing.

BF will not share your personal data with any other company for marketing purposes.

9.0 Opting out

You can ask us to stop sending you marketing messages at any time by contacting us or by selecting the 'unsubscribe' option which is include with each such communication to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of registering for a BF session or activity, only to marketing messages.

10.0 Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Below is a list of cookies used on our website:

Cookie Name	Description
webfxtab_documentPane	These cookies have no impact on your user experience, and store no personal information. These cookies are automatically added by the software that runs this website, but we do not use them in any way.
webfxtab_resourcesPane	
QE_linksShown	
SN49842dc97919a	
_utma	These cookies enable Google Analytics to function. Google Analytics helps us take and analyze visitor information. For example, it tells us how many visitors our site has, how many times they visit, how long they stay on our site and which pages are most popular.
_utmb	
_utmc	
_utmz	
civicAllowCookies	Cookie Control cookies. These cookies are set in order to remember preferences in regards to cookies.

We advise you to check the web and mobile browsers you use for instructions on how to manage your cookies.

11.0 Third-party links

Our website may include links to third-party websites, plug-ins and applications such as PayPal. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. BF does not control these third-party websites and we are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

12.0 Disclosures of your personal data

Any third party joint data controllers or third party data processors we engage in the normal course of our business are required by us to respect the security of your personal data and to treat it in accordance with the law. They are only permitted to process your personal data for specified purposes and in accordance with our instructions.

13.0 Transferring data outside the EEA

We do not currently transfer your data outside of the EEA, except in the case of our use of:

- Mailchimp
- Dropbox
- Google Docs

As part of our commitment to protecting your data we strive at all times to ensure that full and GDPR-compliant arrangements between BF and any automation platforms we use are in place.

14.0 Data security

BF strives to maintain appropriate security measures to prevent your and/or your child's personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those at BF or working with BF who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so

15.0 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In general BF will retain basic information about you and/or your child (including Contact, Identity, and Transaction Data) 3 years from your latest involvement with BF.

In some circumstances you can ask us to delete your data. This is explained in section 9 – Your legal rights below. To do so you should [contact us](#).

In some circumstances we may anonymise your and/or your child's personal data (so that it can no longer be associated with you) for statistical purposes, or to compile impact/benefit reports to organisations which provide BF with funding to support its activities. In this case we may use this information indefinitely without further notice to you.

16.0 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below you should [contact us](#).

We will endeavour to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have a right to:

- **Request access** to your personal data by making a Subject Access Request. This allows you to have a copy of the personal data we hold about you and to check that we are processing it lawfully
- **Request correction** of any incomplete or inaccurate personal data that we hold about you
- **Request erasure** of your personal data. You can ask us to delete or remove personal data where there is no good reason for us continuing to process it

- **Object to the processing** of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of the processing** of your personal data. You may ask us to suspend the processing of your personal data: (a) if you feel it is not accurate, or (b) where our use of the data is unlawful but you do not want us to erase it, or (c) where you need us to retain your data so you can establish, exercise or defend legal claims, or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw any consent you may have given at any time**

You have the right to **make a complaint** at any time to:

- the Information Commissioner's Office – Scotland scotland@ico.org.uk, or
- the Information Commissioner's Office (England and Wales) (www.ico.org.uk)

who collectively are the UK's supervisory authority for data protection issues.

We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

17.0 Changes BF may make to this privacy notice and policy

We reserve the right to update this notice and policy to reflect changes to our information practices and to ensure they are up to date.

We will do this by posting a notice of the update on the BF website, and by change the 'Last Updated' date at the top of the policy. Any updates will become effective immediately after we do this. Updates will apply to all personal information we process information collected about you, and if we make any changes to our policy that materially impact previously collected information about you, we will explain this to you and ask for your consent.

It is important that you review this notice and policy periodically. If we make any changes you are free to decide whether to accept the updated version, but you should be aware that continuing to use the website will entail acceptance of the updates we have made. If you do not agree to any modified version of this notice or policy we advise you to terminate your use of our website.

Updated/March2021